

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

ELEANOR SKELTON,  
Plaintiff,

VS.

THE EXAMINER CORPORATION D/B/A  
THE EXAMINER AND DON J. DODD  
Defendants

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§

CIVIL ACTION NO. 1:18-cv-00203

**DEFENDANTS' FIRST AMENDED ANSWER TO PLAINTIFF'S**  
**FIRST AMENDED COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendants, THE EXAMINER CORPORATION D/B/A THE EXAMINER AND DON J. DODD, and file their First Amended Answer to Plaintiff, ELEANOR SKELTON's First Amended Complaint.

1. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.
2. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.
3. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.
4. This sentence does not require an admit or deny.
5. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.

6. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.

7. Admitted.

8. Admitted.

9. Admitted.

10. Defendant is unable to admit or deny Plaintiff's current residence; therefore, admitted.

11. Admitted.

12. Admitted that Defendant, DON J. DODD is an individual who has made an appearance in this lawsuit; otherwise, denied.

13. This sentence is a characterization of Plaintiff's allegations and as such need not to be admitted or denied; alternatively, denied.

14. Unable to admit or deny, therefore denied.

15. Unable to admit or deny, therefore denied.

16. Unable to admit or deny, therefore denied.

17. This sentence is a characterization of Plaintiff's allegations and as such need not to be admitted or denied; alternatively, denied.

18. Admitted as to Defendant, THE EXAMINER CORPORATION D/B/A THE EXAMINER; and denied as to Defendant, DON J. DODD.

19. This sentence is a characterization of Plaintiff's allegations and as such need not to be admitted or denied; alternatively, denied.

20. Admitted as to Defendant, THE EXAMINER CORPORATION D/B/A THE EXAMINER; and denied as to Defendant, DON J. DODD.

21. Admitted as to Defendant, THE EXAMINER CORPORATION D/B/A THE EXAMINER; and denied as to Defendant, DON J. DODD.

22. Admitted as to Defendant, THE EXAMINER CORPORATION D/B/A THE EXAMINER; and denied as to Defendant, DON J. DODD.

23. Admitted.

24. Admitted.

25. Admitted as to The Examiner, and as to Don Dodd only in his capacity as an employee of The Examiner.

26. Admitted as to The Examiner, and as to Don Dodd only in his capacity as an employee of The Examiner.

27. Admitted as to The Examiner, and as to Don Dodd only in his capacity as an employee of The Examiner.

28. Admitted as to The Examiner, and as to Don Dodd only in his capacity as an employee of The Examiner.

29. Admitted as to The Examiner, and as to Don Dodd only in his capacity as an employee of The Examiner.

30. Admitted as to The Examiner, and as to Don Dodd only in his capacity as an employee of The Examiner.

31. Denied as worded.

32. Denied as worded.

- 33. Denied.
- 34. Denied as worded.
- 35. Denied.
- 36. Denied.
- 37. Denied.
- 38. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.
- 39. First sentence, admitted. Second sentence, denied as worded.
- 40. Denied.
- 41. First sentence denied as worded. The rest, denied.
- 42. Admitted.
- 43. Admitted except as to the exact words quoted and exact time.
- 44. Denied as worded.
- 45. Denied as worded.
- 46. Denied.
- 47. Denied as worded.
- 48. Admitted.
- 49. Denied.
- 50. Admitted.
- 51. Denied.
- 52. Denied as worded.
- 53. Denied.

54. Denied.

55. Denied.

56. Denied.

57. Denied.

58. Denied.

59. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.

60. Admitted.

61. Admitted as a general proposition of the FLSA; denied that Plaintiff is actually entitled to any such recovery.

62. Denied.

63. Denied.

64. Denied.

65. Denied.

66. Denied as worded.

67. Denied.

68. Admitted as a general proposition of the FLSA; denied that Plaintiff is actually entitled to any such recovery.

69. Denied.

70. Denied.

71. This sentence is a characterization of Plaintiff's allegations and as such need not to be admitted or denied; alternatively, denied.

72. This sentence is a characterization of Plaintiff's allegations and as such need not to be admitted or denied; alternatively, denied.

73. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.

74. Admitted.

75. Admitted.

76. Denied.

77. Denied.

78. Denied.

79. Denied.

80. Denied.

81. Denied.

82. Denied.

83. Admitted that this is the nature of the allegations in the complaint; otherwise, denied

84. Denied.

85. Admitted that this is the nature of the allegations in the complaint; otherwise, denied.

### **PRAYER**

Defendants deny that Plaintiff is entitled to any relief. Defendants pray that Plaintiff take nothing from this suit and go hence without day, and that costs of suit be assessed against Plaintiff.

Respectfully submitted,

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By: 

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Attorney for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to all appropriate parties on this 15<sup>th</sup> day of May, 2019.

  
John Werner